

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY, et al.

Defendants

CIVIL ACTION

No. 3:17-CV-2183-MEM

ORDER

AND NOW, this _____ day of _____, 2018, based upon Plaintiff's Motion to Extend Deadline to Amend Pleadings, said motion is GRANTED. The deadline to amend pleadings in this matter shall be on or before

_____.

BY THE COURT:

_____ J.

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Plaintiff

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Defendants

CIVIL ACTION

No. 3:17-CV-2183-MEM

MOTION TO EXTEND DEADLINE TO AMEND PLEADINGS

NOW COMES, the Plaintiff, Robert Stoud, by and through his counsel, and in support of this motion, avers as follows:

1. Pursuant to an Order dated April 10, 2018 (Doc. 14) entered by this Honorable Court, the final date for the amendment of pleadings shall be July 2, 2018.
2. On or about January 29, 2018, Defendants filed a Motion to Dismiss for Failure to State a Claim (Doc. 8).
3. The parties filed their respective briefs related to the aforesaid motion and issues raised therein.
4. As of the date of this filing, the parties are awaiting a ruling on Defendants' Motion to Dismiss.

5. Given that a decision has not been handed down by this Honorable Court related to Defendants' motion, Plaintiff is seeking to extend the deadline to amend pleadings.
6. Via email on June 22, 2018, Plaintiff's counsel sought concurrence with this request.
7. As of the date of this filing, defense counsel has yet to respond regarding concurrence. As such, Plaintiff's counsel will deem the lack of answer as non-concurrence.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court extend the deadline to amend pleadings.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
Bar I.D. # PA 49625
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/s/ Christopher J. Szewczyk, Esquire
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Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
P: (570) 348-0776
F: (570) 348-2755

Date: June 29, 2018

CERTIFICATE OF NON-CONCURRENCE

The undersigned hereby certifies that on June 22, 2018, he contacted A. James Hailstone, Esquire requesting concurrence in the foregoing motion. Attorney Hailstone did not provide a response regarding his concurrence.

/s/ Christopher J. Szewczyk, Esquire
Christopher J. Szewczyk, Esquire
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
(570) 348-0776

Dated: June 29, 2018

CERTIFICATE OF SERVICE

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 29th day of June, 2018.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire